

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

24 MAG 4087

UNITED STATES OF AMERICA

v.

ERALD ALIMEHMETI,

Defendant.

SEALED COMPLAINT

Violations of 18 U.S.C. §§ 842(p), 2339B,
3238, and 2

SOUTHERN DISTRICT OF NEW YORK, ss.:

MICHAEL KANE, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation (“FBI”) and charges as follows:

Count One

**(Attempted Provision of Material Support and Resources to a Designated Foreign
Terrorist Organization)**

1. From at least in or about June 2019, up to and including on or about the date of the filing of this Complaint, in Albania, the Southern District of New York, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, ERALD ALIMEHMETI, the defendant, who is expected to be first brought to and arrested in the Southern District of New York, knowingly attempted to provide “material support or resources,” as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel and services, to a foreign terrorist organization, to wit, the Islamic State of Iraq and al-Sham (“ISIS”), which at all relevant times has been designated by the U.S. Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act (“INA”), and is currently designated as such as of the date of this Complaint, knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339(B)(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in Section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

(Title 18, United States Code, Sections 2339B, 3238, and 2.)

Count Two

**(Distribution of Information Relating to Explosives, Destructive Devices, and Weapons of
Mass Destruction)**

2. In or about 2019 and 2020, in Albania, the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, ERALD ALIMEHMETI, the defendant, who is expected to be first

brought to and arrested in the Southern District of New York, taught and demonstrated the making and use of an explosive, a destructive device, and a weapon of mass destruction, and distributed by any means information pertaining to, in whole or in part, the manufacture and use of an explosive, destructive device, and weapon of mass destruction, with the intent that the teaching, demonstration, and information be used for, and in furtherance of, activities that constitute Federal crimes of violence, to wit, ALIMEHMETI distributed bomb-making and explosives instructions over the internet with the intent that the information be used for, and in furtherance of, the use of a weapon of mass destruction, in violation of Title 18, United States Code, Section 2332a.

(Title 18, United States Code, Sections 842(p), 3238, and 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

3. I am a Special Agent with the FBI, and I am assigned to a counterterrorism squad with the Joint Terrorism Task Force. I have been personally involved in the investigation of this matter. This affidavit is based in part upon my training and experience, my involvement in this and other investigations, my conversations with law enforcement agents and other individuals, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all of the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated. Any errors in grammar, spelling, and punctuation in language quoted below are how they appeared in the underlying documents and communications.¹

Overview

4. ERALD ALIMEHMETI, the defendant, is a 33-year-old dual citizen of the United States and Albania and a former resident of the Bronx, New York. In or about 2014, ALIMEHMETI left the United States and moved to Albania. From in or about August 2015 until in or about May 2019, ALIMEHMETI was imprisoned in Albania for a weapons offense, and from in or about November 2020 until in or about July 2022, ALIMEHMETI was imprisoned in Albania for assault.

5. As set forth in greater detail below, shortly after his release from Albanian prison in or about 2019, and before his subsequent arrest in Albania in or about 2020, ERALD ALIMEHMETI, the defendant, created and used numerous online accounts on encrypted applications and social media websites to communicate with other ISIS supporters in order to train and plan for attacks on behalf of ISIS. Among other things, ALIMEHMETI has publicly proclaimed, on a social media website, that “its time for a genocide.” ALIMEHMETI has also requested what he has described as “tactical” equipment and “gear” for “training” and “operations” in support of ISIS, including particular models of vests capable of holding “ballistic plates,” “magazine pouches,” and “knives,” and described modifications he intended to make to his “AKM,” an apparent reference to an assault rifle. He also regularly posted pro-ISIS propaganda,

¹ Some of the descriptions of communications are based on draft translations prepared by FBI linguists fluent in Arabic, Albanian, and English and are subject to change.

praising specific ISIS leaders and promoting ISIS-issued publications and videos. And ALIMEHMETI disseminated on pro-ISIS channels dozens of instructional manuals and videos on topics such as firearms-handling, explosives-making, defensive tactics, and outdoor survival. Such materials included, among other things, directions on how to make incendiaries to spray at innocent bystanders. ALIMEHMETI shared some of these communications with an FBI confidential human source (“CHS”)² and an FBI online covert employee (“OCE”), who were posing as ISIS supporters in communications with ALIMEHMETI and preserved screenshots of their conversations with ALIMEHMETI.

6. Some of the encrypted messaging applications used by ERALD ALIMEHMETI, the defendant, allow users to send and receive messages in private exchanges referred to as “chats.” Some of the encrypted messaging applications also allow users to create “channels,” to which users can choose to subscribe for the purpose of exchanging information with other members of that user community. The creator, or “owner,” of a channel has the ability to designate one or more “administrators” to help manage the channel. The administrator has the ability to, among other things, add subscribers, remove subscribers, and change the name of the channel. As explained in more detail below, ALIMEHMETI sent chats and served as the administrator for several channels.

7. On or about February 21, 2018, the brother of ERALD ALIMEHMETI, the defendant, (“Brother-1”), pled guilty in the Southern District of New York to attempting to provide material support to ISIS and attempting to fraudulently procure a U.S. passport to facilitate an act of international terrorism. On or about December 6, 2019, Brother-1 was sentenced to 22 years in prison. While Brother-1 has been in prison, ALIMEHMETI has been in contact with him and they have discussed, among other things, violence in prison and have referenced ISIS. For example, on or about November 7, 2018, ALIMEHMETI wrote a letter to Brother-1 that, in prison, he should not back down from fights, but should instead “fuck them up, stab them,” and further wrote, in apparent reference to U.S.-led coalition forces’ 2018 operations to defeat ISIS, “Have you heard? The mushriks [*i.e.*, non-believers] took over Mosul and Raqqa and they’re saying there’s no more jihad? lol.”

ISIS

8. Based on my training and experience as a counterterrorism agent of the FBI, my involvement in this investigation, including my review of open-source materials and foreign and domestic law enforcement reports, and my conversations with other law enforcement agents, I have learned, among other things, the following:

a. On or about October 15, 2004, the United States Secretary of State designated al Qaeda in Iraq (“AQI”), then known as Jam ’at al Tawid wa’ al-Jahid, as a foreign terrorist organization (“FTO”) under Section 219 of the INA and as a Specially Designated Global Terrorist (“SDGT”) entity under Section 1(b) of Executive Order 13224. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the

² The CHS has been a paid informant for the FBI since approximately 2017. The information provided by the CHS has been reliable and has been corroborated by independent evidence, including the electronic communications and other records described herein.

INA and as a SDGT entity under Section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (“ISIL”) as its primary name. The Secretary of State also added the following aliases to the FTO listing: The Islamic State of Iraq and al-Sham (“ISIS”—which, as explained above, is how the FTO will be referenced herein), The Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furquan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. On March 22, 2019, the U.S. Secretary of State added the following aliases to the FTO and SDGT listings: Amaq News Agency, Al Hayat Media Center, and Al Hayat. To date, ISIS remains a designated FTO.

b. Based on my participation in this investigation and my review of open-source reporting, I know, among other things, that on or about September 21, 2014, then-ISIS spokesperson Abu Muhammad al-Adnani (“Adnani”) issued a recorded statement calling for attacks against citizens—civilian or military—of the countries participating in the United States-led coalition against ISIS. Adnani specifically called for suicide bombings, shootings, and vehicle attacks.

c. ISIS members and associates make and have made public statements and issued public declarations, which, among other things, (a) proclaimed and acknowledged that acts of violence had been committed by ISIS; (b) threatened future acts of violence if ISIS’s demands were not met; and (c) were intended to promote and foster the prestige and standing of ISIS. ISIS has claimed responsibility for the following terrorist attacks, among others: (i) on or about November 13 and 14, 2015, a group of attackers carried out attacks in Paris, France, which killed approximately 130 people; (ii) on or about March 22, 2016, a group of attackers carried out bombings in Brussels, Belgium, which killed at least 32 people; (iii) on or about July 14, 2016, an attacker used a truck to run over civilians in Nice, France, killing more than 80 people and injuring more than 300; (iv) on or about October 31, 2017, an attacker, later sentenced to multiple life sentences after being convicted at trial in the Southern District of New York, used a truck to run over civilians in Manhattan, New York, killing eight people and injuring several others; (v) on or about January 3, 2024, two attackers carried out bombings in Kerman, Iran, killing at least 94 people and wounding many more; and (vi) on or about March 22, 2024, a group of assailants stormed a concert hall in Moscow, Russia, killing at least 60 people and injuring over 145 others.

d. To gain support, ISIS, like many other terrorist organizations, spreads its message using social media, Internet platforms, and email. Using these platforms, ISIS has disseminated a wide variety of recruiting materials and propaganda through social media, which includes photographs and videos depicting ISIS activities, including beheadings and other atrocities, as well as audio and video lectures by members of ISIS and members of other Islamic extremist organizations. Among other internet and social media platforms, ISIS has popularized the use of end-to-end encrypted communication services and applications as a means of recruiting, communicating with, and disseminating terrorist training materials and propaganda to its members and supporters.

e. The U.S. State Department has reported that, among other things, ISIS has committed systematic abuses of human rights and violations of international law, including indiscriminate killing and deliberate targeting of civilians, mass executions and extrajudicial killings, persecution of individuals and communities on the basis of their religion, nationality, or

ethnicity, kidnapping of civilians, forced displacement of various communities and minority groups, and killing and maiming of children, rape, and other forms of sexual violence. According to the U.S. State Department, ISIS has recruited foreign fighters from across the globe and leveraged technology to spread its violent extremist ideology and for incitement to commit terrorist acts.

ALIMEHMETI's Dissemination of Pro-ISIS Propaganda

9. Based on my training and experience as a counterterrorism agent of the FBI, my involvement in this investigation, including my review of electronic communications and social media posts, my conversations with other law enforcement officers, and my review of FBI reports, screenshots,³ and other records, I have learned, among other things, that from at least in or about June 2019 up to and including in or about January 2020, ERALD ALIMEHMETI, the defendant, in between his separate Albanian prison sentences, used multiple electronic accounts to promote ISIS and jihadist activities.⁴ For example:

a. On or about June 30, 2019, on a social media account subscribed in ALIMEHMETI's legal name⁵ ("Social Media Account-1"), ALIMEHMETI posted a photograph of an individual I recognize, based on my training and experience, as ISIS propagandist Shaykh ul-Haqq Musa Cerantonio and a status update: "Shaykh ul-Haqq Musa Cerantonio, may Allah bless him and protect him. The Shaykh who raised the soldiers of the Caliphate you now see in the Philippines today. Outlawed by kuffar⁶ . . . and all other dollar preacher infidels he made hijra to the Philippines where he called the Muslims to the truth."

b. On or about July 2, 2019, on Social Media Account-1, ALIMEHMETI posted a photograph of an individual I recognize, based on my training and experience, as the Libyan terrorist and high-ranking al Qaeda official Abu Yahya al-Libi and a status update: "[A]bu

³ Based on my training and experience, I know that a screenshot is a visual capture of a computer screen at a particular moment in time. In the course of this investigation, law enforcement officers and witnesses took screenshots of, among other things, their electronic communications with ALIMEHMETI and content posted by ALIMEHMETI on various encrypted applications.

⁴ ALIMEHMETI has used multiple accounts on the social media and encrypted electronic messaging platforms referenced herein to communicate with the CHS and OCE (the "Accounts"). Based on my review of those communications and available subscriber information for the Accounts, I believe that ALIMEHMETI, and not another individual, was the user of the Accounts when he communicated with the CHS and OCE because, among other things, the context, timing, subject matter, usernames, and language used in the communications, all indicate that ALIMEHMETI was the user of the Accounts.

⁵ I have also reviewed the profile picture for Social Media Account-1 and compared it to a picture of ALIMEHMETI from his U.S. Passport and believe them to be the same person.

⁶ Based on my training, experience, and participation in this investigation, I know that the term "kafir," or "kuffar," refers to a non-believer in Islam.

Yahya al-Libi . رحمه الله The brother is a mentor to me and one of the first people I learned the aqeedah from. Allah enable us to meet in Jannah.”⁷

c. On or about July 13, 2019, on Social Media Account-1, ALIMEHMETI posted: “The few. The steadfast. The inghimasiyeen.”⁸

d. In or about June and July 2019, on Social Media Account-1, ALIMEHMETI posted photographs of various jihadist publications, including “The Islamic Ruling of the Permissibility of Self-Sacrificial Operations: Suicide, or Martyrdom?,” “The Book of Jihad,” and “Ad-Dala’il FI Hukm Muwalat Ahl Al-Ishrak” (which is translated on the cover of the document as “The Evidences for the Ruling Regarding Alliance with the Infidels and Matters Related to It”).

e. On or about November 26, 2019, using a second account on the same social media website (“Social Media Account-2”), ALIMEHMETI posted a video depicting the killing of U.S. Special Forces in Niger and an accompanying comment in Albanian. Based on a translation provided by an FBI linguist, I have learned the comment states: “The Islamic State in Africa killing crusaders, American and French special forces. Look at how the US special forces scream before they die!!! Hahaha!”

f. On or about January 9, 2020, ALIMEHMETI posted a video on Social Media Account-2 with the caption, “History of the Islamic State 2003-2015.”

g. On or about January 17, 2020, ALIMEHMETI posted on Social Media Account-2 a link to a website about the DroneGun MKIII,” which, according to the image preview visible in the post, “is effective against a wide range of drones and has been designed for straight forward, single handed operation.”

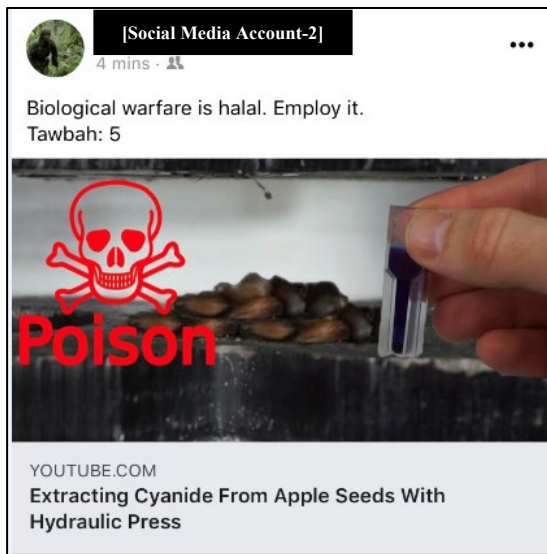
h. On or about January 18, 2020, ALIMEHMETI wrote on Social Media Account-2, “I think it’s time for the Khilafah to change tactics. I think its time for a genocide.”

i. On or about January 22, 2020, as depicted in the screenshots below, ALIMEHMETI posted on Social Media Account-2 (i) a video titled “Extracting Cyanide from Apple Seeds With Hydraulic Press” with the comment, “Biological warfare is halal. Employ it.”

⁷ Based on my training, experience, and participation in this investigation, I know that the term “aqeedah” refers to creed or theology, and “Jannah” refers to an Islamic concept of heaven or paradise.

⁸ Based on my training, experience, and participation in this investigation, I know that the term “inghimasi” refers to militants employed by ISIS and other extremist groups to conduct suicide attacks.

and (ii) a video titled “Potassium cyanide preparation” with the comment, “Khalifah must employ Biological Warfare. Revenge for Baghuz.”⁹



ALIMEHMETI Requests Tactical Equipment from the CHS for “Covert Ops”

10. Based on my training and experience, involvement in this investigation, my conversations with other law enforcement officers, and my review of FBI reports, screenshots, social media records, and messages from the encrypted applications, I have learned, among other things, that between in or about June 2019 and in or about September 2020, while in between his two separate Albanian prison sentences, ERLD ALIMEHMETI, the defendant, communicated over a social media platform and numerous encrypted applications with the CHS, who was posing as an ISIS supporter. In particular, I have learned that the CHS’s communications with ALIMEHMETI included the following:

a. On or about June 28, 2019, using an account on an encrypted messaging application (“Encrypted Messaging Account-1”), ALIMEHMETI wrote to the CHS, “I have no loyalty to any country. . . . Where the sharia¹⁰ rules is my country!” He further wrote, “I’ll behead my whole family if they fight this religion!” He then sent a photograph depicting an individual I

⁹ Based on my training and experience, and open-source information, I believe ALIMEHMETI was expressing support for attacks executed by ISIS supporters around the world in April 2022 as revenge for the Battle of Baghuz Fawqani, which was a Syrian offensive against ISIS that was supported by U.S.-led coalition forces designed to counteract ISIS in the Middle East.

¹⁰ Based on my training, experience, and participation in this investigation, I know that “sharia” refers to a strict form of Islamic law that is advocated for by jihadist organizations such as ISIS, and is often enforced by such groups through violence.

recognize, based on my training and experience, as ISIS leader Abdul Rahman al-Iraqi posing in front of a row of severed heads and wrote, “Thats what I think of the sahawwat.”¹¹

b. In or about June and July 2019, using Encrypted Messaging Account-1, ALIMEHMETI requested the CHS’s help with “something im not able to do in Albania,” and asked the CHS to purchase “a plate carrier,” “magazine pouches,” and inquired whether the CHS could obtain “rifle modifications such as polymer buttstocks handguards optics.”¹² On or about July 2, 2019, after ALIMEHMETI sent the CHS a series of links for equipment purchases, ALIMEHMETI asked the CHS to “send me the links ive sent so far im going to save them also.” On or about July 10, 2019, ALIMEHMETI sent the CHS additional links for “the gear” and stated, “Ship me this as soon as possible if you can so I can continue my training.”

c. In or about October 2019, using a different account on the same encrypted messaging application (“Encrypted Messaging Account-2”), ALIMEHMETI asked the CHS for additional equipment, including vests with ballistic plates. ALIMEHMETI also confirmed that he intended to target mosques and other Muslims whom he believed to be “kuffar,” which as explained above is a term that refers to non-believers. ALIMEHMETI stated, “Come on don’t tell me we cant kill them. Killing them is the best part akhi. They are kuffar akhi u don’t know situation here.” Later that month, using Encrypted Messaging Account-2, ALIMEHMETI requested funds to purchase operational supplies and stated that he needed to focus on his “covert ops,” which required scouting sites for his planned “DC sniper” style attacks.¹³ ALIMEHMETI further stated that he required the specific equipment on his list and offered to provide proof of his location in Albania if any ISIS supporters needed it in order to give him funding.

¹¹ Based on training, experience, and participation in this investigation, I know that the term “sahawat” means “awakening” and is often used as a derogatory term for individuals that either collaborate with the United States or abandoned fighting against the United States in Iraq and/or Syria.

¹² Based on my training, experience, and participation in this investigation, I know that “a plate carrier” is a type of tactical vest capable of holding body armor plates to protect the wearer from bullets and other ballistic threats, and that “rifle modifications” are alterations that can be made to a rifle to change its appearance and/or functionality.

¹³ Based on my training, experience, and familiarity with mass-murder attacks, I understand the reference to “DC sniper” style attacks to mean the coordinated shootings conducted by two snipers in the Washington, D.C. metropolitan area in 2002 that resulted in multiple fatalities.

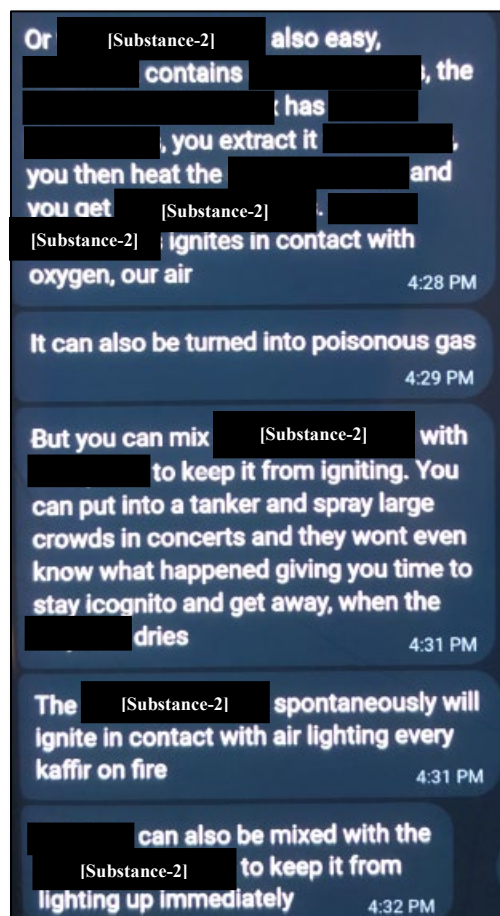
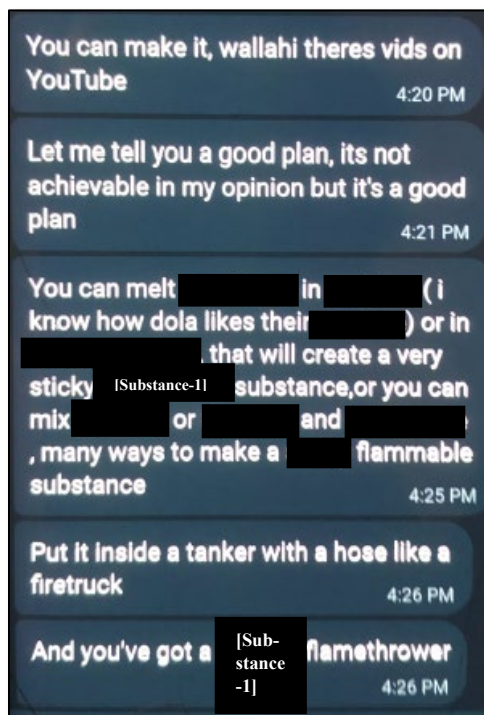
ALIMEHMETI Provides the CHS Instructions on How to Make Explosives

d. On or about December 22, 2019, using another account on an encrypted messaging application (“Encrypted Messaging Account-3”), ALIMEHMETI asked the CHS, “Have you checked out the group, new content and lots more on explosives.” The next day, using Encrypted Messaging Account-3, ALIMEHMETI informed the CHS, “Collecting the last few chemistry vids and im done with collecting material on explosives.”

e. As depicted in the screenshots below,¹⁴ ALIMEHMETI then advised the CHS on a specific method of making a particular explosive chemical substance (“Substance-1”); how to extract and produce a second explosive chemical substance (“Substance-2”); and how to prevent Substance-2 from alighting immediately before an attack. He then explained how Substance-2 could be used in a mass terrorist attack: “You can put into a tanker and spray large crowds in concerts and they wont even know what happened giving you time to stay i[n]ognito and get away The [Substance-2] spontaneously will ignite in contact with air lighting every kaffir on fire.”¹⁵

¹⁴ ALIMEHMETI provided specific details that have been partially redacted.

¹⁵ On or about January 2, 2020, ALIMEHMETI also posted an instructional video titled “Making [Substance-2]” to the InGhimasi Warfare channel.



ALIMEHMETI Discusses the Logistics of Obtaining “Gear” for Others for an “Op”

f. On or about January 15, 2020, in a group chat on an encrypted messaging platform, under the guise of connecting ALIMEHMETI to people who could help with an operation, the CHS introduced ALIMEHMETI, who was using another account on an encrypted messaging platform (“Encrypted Messaging Account-4”) to two additional confidential human sources (the “Other Sources”), who posed as ISIS supporters. ALIMEHMETI asked the Other Sources about their military experience and skills and referenced the “op,” for which he sought their participation, writing, among other things, “Do you know sniping akhi? The formulas and ballistics?” He also wrote, “I will brief you brothers right before the op, not here akhi. Do you both know how to use red dot optics and how to zero them?” and “I don’t have enough money and waiting for our bro [CHS] to send me some money so I can really get started on ops.”

g. ALIMEHMETI then stated that he had written an “air defense manual” (the “Air Defense Manual”), which he shared in the group chat for the Other Sources’ feedback. Based on my review of the Air Defense Manual, the first page of which is depicted below, I know that it contains instructions in English and Arabic and details how to defend against air attacks and take down aircraft. The second page of the manual features a small image of a black flag with white writing, which I believe is the ISIS flag, and one of the concluding pages states: “Publication was

kept as short and simple as possible in order not to stress brothers with too much information. Read. Practice. Adapt. Overcome. Destroy the enemy. Our mission ends only by achieving shahada.”¹⁶



ALIMEHMETI Publishes Instructions about Making Explosives to His Online Encrypted Channels with Other ISIS Supporters

11. Based on my training and experience, involvement in this investigation, conversations with other law enforcement officers, and review of FBI reports, records, and screenshots of messages captured by the OCE, I have learned, among other things, the following:

a. On or about January 23, 2020, the OCE contacted ERALD ALIMEHMETI, the defendant, on Social Media Account-2. ALIMEHMETI responded and invited the OCE to “a tactical channel providing training for brothers and sisters,” which I believe to be a reference to an online group of like-minded ISIS supporters.

b. The channel, titled “InGhimasi Warfare,” appeared on an encrypted messaging application (“Encrypted Messaging Account-5”) and had approximately 45 subscribers, and ALIMEHMETI served as an administrator. As noted above, *supra* ¶ 9.c, I understand the term “inghimasi” to refer to militants employed by ISIS and other extremist groups to conduct suicide attacks. ALIMEHMETI served as an administrator for other similarly named channels, such as “!nGhimasi Tactical Solucion” and “TacEffective InGh1mas!,” and that ALIMEHMETI had posted dozens of links and documents, available for PDF download, on the InGhimasi Warfare channel over the encrypted messaging platform, with comments encouraging the use of these resources. For example:

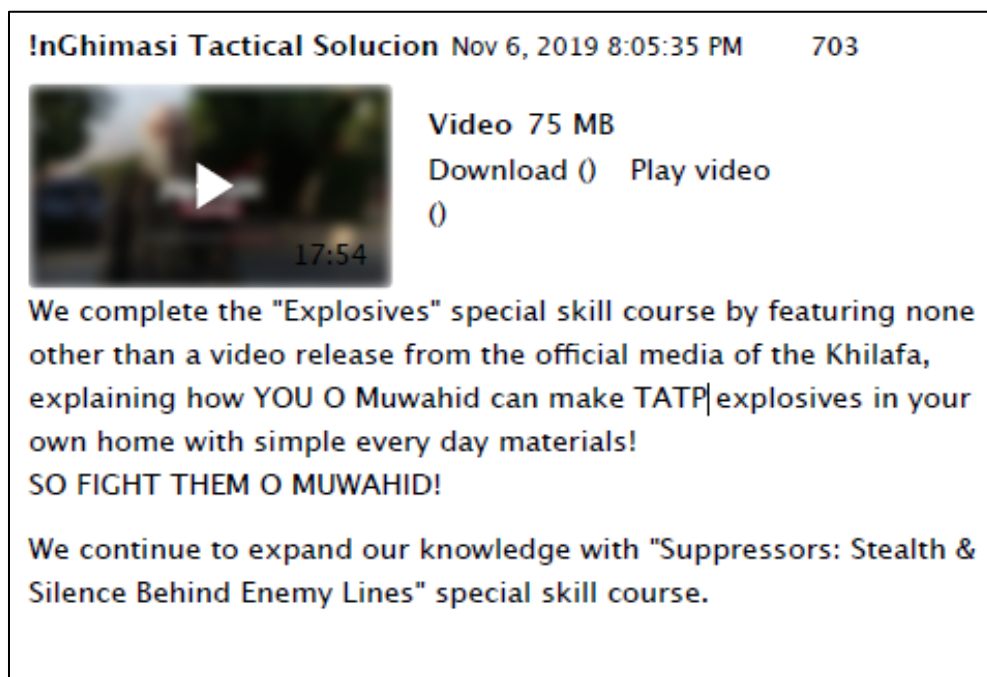
i. On or about November 4, 2019, as an administrator for !nGhimasi Tactical Solucion, ALIMEHMETI posted a statement: “Welcome to basic training! Here you will

¹⁶ Based on my training and experience, and my involvement in this investigation, I know that the term “shahada” refers to a declaration of faith and creed for Muslims.

learn basic skills you will need to operate as a soldier! Shirk is your enemy, the kuffar are your targets and Jannah is your destination! We begin with learning how to operate your equipment!”

ii. On November 6, 2019, as an administrator for InGhimasi Tactical Solucion, ALIMEHMETI posted a video produced by ISIS to show viewers how to make “TATP”-based explosives at home.¹⁷ Based on the description provided by ALIMEHMETI—“a video release from the official media of the Khilafa, explaining how YOU O Muwahid can make TATP explosives in your own home . . . SO FIGHT THEM O MUWAHID”—I believe this is a reference to the well-known ISIS video titled “You Must Fight Them O Muwahhid,” which provides step-by-step instructions for constructing a TATP-based explosive device and attacking a human target with a knife.

iii. On or about January 4, 2020, as an administrator for TacEffective InGh1mas!, ALIMEHMETI posted six videos on “Survival Secrets” for a variety of combat scenarios. He also posted an accompanying statement: “Before we begin with your basic training we offer these videos for viewing in order to get familiar with and have as a reference to many of the skills you will learn once you begin your training. Take the time to view these in order to better understand your training once you begin!”



¹⁷ “TATP,” which refers to a triacetone tricerperoxide-based explosive, has been described in the media as ISIS’s “signature” explosive and was used in, among other attacks, the 2016 Brussels and 2017 Manchester Arena bombings. See Neil Collier et. Al, A Signature ISIS Explosive in Europe, *available at* <http://www.nytimes.com/video/world/Europe/100000004281038/isis-signature-explosive-in-europe.html>.

ALIMEHMETI's Laptop

12. Based on my training and experience, involvement in this investigation, conversations with other law enforcement officers, including Albanian authorities, and review of law enforcement reports and records, I have learned, among other things, the following:

a. Shortly after the arrest of ERALD ALIMEHMETI, the defendant, in or about November 2020, Albanian authorities searched his residence in Tirana, Albania and seized his laptop (the "Alimehmeti Laptop").

b. In or about February 2023, Albanian authorities provided the FBI with a forensic image of the Alimehmeti Laptop.

13. Based on my review of the image of the Alimehmeti Laptop, I have learned the following:

a. The Alimehmeti Laptop contains screenshots of two posts by ERALD ALIMEHMETI, the defendant, on Social Media Account-2 which advocate for biological warfare in support of ISIS.

b. The Alimehmeti Laptop contains numerous files, portions of files, and bookmarks that correspond to ISIS propaganda and training materials, some of which ALIMEHMETI shared with others through his social media accounts. For example, the Alimehmeti Laptop contained a thumbnail-sized image of "The Book of Jihad," the cover of which was posted on Social Media Account-2, *see supra* ¶ 9.d.

14. In addition, the Alimehmeti Laptop contains thumbnail images, file fragments or bookmarks corresponding to the following known written publications and videos:

a. Inside the Khalifa, a series of ISIS propaganda videos advocating jihad and depicting ISIS attacks;

b. Flames of War, a video that describes the fight against ISIS and opposition forces and contains imagery celebrating ISIS fighters in Syria and Iraq;

c. The Anarchist Bomb Cookbook Manual, a set of instructions on how to manufacture explosives; and

d. The Islamic Ruling on the Permissibility of Martyrdom Operations, a book that purports to describe the religious justification for suicide attacks.

ALIMEHMETI Requests Tactical Equipment from an Individual in the Southern District of New York

15. Between July 2024 and September 2024, FBI agents conducted a consensual interview of an individual ("Individual-1"), who has known ERALD ALIMEHMETI, the defendant, since ALIMEHMETI resided in the Bronx, New York. During that interview, Individual-1 stated, among other things, the following:

a. About three or four years ago, when Individual-1 was residing in the Bronx, New York, Individual-1 received messages from ALIMEHMETI asking Individual-1 to purchase a variety of “tactical” items for ALIMEHMETI, such as a tactical vest, magazine pouches and outdoor equipment. Individual-1 did not know why ALIMEHMETI wanted the requested items.

b. Individual-1 explained that ALIMEHMETI had sent money to pay for the purchase of the requested items and suggested having someone pick up the items from Individual-1, but no such arrangements were made.

c. ALIMEHMETI continued sending requests for equipment to Individual-1 on an encrypted messaging application (“Encrypted Messaging Account-6”). Based on my review of messages that Individual-1 exchanged with ALIMEHMETI on Encrypted Messaging Account-6, as displayed on Individual-1’s phone and as voluntarily shown to me and other law enforcement agents by Individual-1, I know that the last retained message to Individual-1 from ALIMEHMETI through Encrypted Messaging Account-6 was dated July 7, 2024 and read: “Why u deleted last chat woth links [slur] I hadn’t saved those.”

d. Individual-1 confirmed to FBI agents that the referenced links were for tactical equipment that ALIMEHMETI had requested.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of ERALD ALIMEHMETI, the defendant, and that he be imprisoned or bailed, as the case may be.

FURTHER, the Government respectfully moves for this Complaint and the associated arrest warrant to remain sealed, with the exception that this Complaint and the arrest warrant are unsealed or the limited purpose of disclosing the existence of or disseminating this Complaint and/or arrest warrant to relevant United States, foreign, or intergovernmental authorities, at the discretion of the United States and in connection with efforts to prosecute the defendant or to secure the defendant's arrest, extradition, or expulsion as otherwise required for purposes of national security.

/s/ Michael Kane, with permission by SDA
MICHAEL KANE
Special Agent
Federal Bureau of Investigation

Sworn to me through the transmission of
this Complaint by reliable electronic
means (telephone), this 21st day of November, 2024



THE HONORABLE STEWART D. AARON
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK